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*Attorneys for Defendants Trust for the Benefit of Ryan Tavlin,  
Doron Tavlin, in his capacity as Trustee of the Trust for the  
Benefit of Ryan Tavlin, Omega Asset Management, LLC, and  
Ryan Tavlin, individually as beneficiary of the Trust for the  
Benefit of Ryan Tavlin*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of  
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

TRUST FOR THE BENEFIT OF RYAN TAVLIN,

HARVEY KRAUSS, in his capacity as Trustee of the  
Trust for the Benefit of Ryan Tavlin,

DORON TAVLIN, in his capacity as Trustee of the  
Trust for the Benefit of Ryan Tavlin,

OMEGA ASSET MANAGEMENT, LLC, and

Adv. Pro. No. 10-05232 (SMB)

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RYAN TAVLIN, individually as beneficiary of the  
Trust for the Benefit of Ryan Tavlin,  
Defendants.

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**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the incorrectly named defendants in this Adversary Proceeding represented by Becker & Poliakoff, LLP on Exhibit A to the Notice of Motions to Dismiss are corrected as follows: Trust for the Benefit of Ryan Tavlin, Doron Tavlin, in his capacity as Trustee of the Trust for the Benefit of Ryan Tavlin, Omega Asset Management, LLC, and Ryan Tavlin, individually as beneficiary of the Trust for the Benefit of Ryan Tavlin (the "Corrected Defendants").

IF IS HEREBY FURTHER STIPULATED AND AGREED, that the motion to dismiss filed in this adversary proceeding on October 31, 2013 [ECF No. 28] was filed on behalf of the Corrected Defendants.

Dated as of: April 16, 2014

**BAKER & HOSTETLER LLP**

By: /s/ Nicholas J. Cremona

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Picard, Trustee for the Liquidation  
of Bernard L. Madoff Investment  
Securities LLC*

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Benefit of Ryan Tavlin, Omega Asset  
Management, LLC, and Ryan Tavlin,  
individually as beneficiary of the Trust for  
the Benefit of Ryan Tavlin*